

Volume: 1  
Pages: 1 to 99  
Exhibits: See Index

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
C.A. No. 04-CV-11069-JLT

ABRAHAM PHILIP, M.D., )  
Plaintiff )

vs. )

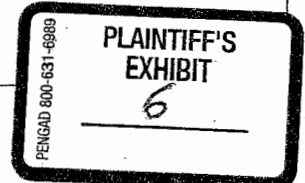
JOHN CRONIN, in his personal )  
capacity, )  
Defendant )

DEPOSITION of JOHN CRONIN,  
a witness called on behalf of the  
Plaintiff, pursuant to the applicable  
provisions of the Federal Rules of Civil  
Procedure, before Judith R. Sidel,  
Professional Court Reporter and Notary  
Public, in and for the Commonwealth of  
Massachusetts, at the Office of the  
Chief Medical Examiner, 720 Albany  
Street, Boston, Massachusetts 02118, on  
Wednesday, June 22, 2005, commencing at  
10:10 a.m.

APPEARANCES: (Continued on page 2)

\* \* \* \*

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1 Q. Just talking about face-to-face meetings  
2 right now, do you remember how many  
3 there were relating to terminating  
4 Dr. Philip?

5 A. I believe there was one meeting, sir.

6 Q. And who do you recall was in that  
7 meeting?

8 A. The chief of staff for the executive  
9 office of public safety, the  
10 undersecretary to which this agency  
11 reported, the human resources directors  
12 for the CME, and the executive office  
13 of public safety. Dr. Richard Evans, I  
14 believe, was there, the general counsel  
15 for our agent.

16 Q. That's Miss Faherty?

17 A. That's right. I believe that's it, sir,  
18 that I recall.

19 Q. During that meeting was there any  
20 discussion of any letters that Dr. Philip  
21 had sent to Governor Romney?

22 A. Yes, sir.

23 Q. What was that discussion?

24 A. As I recall, folks were notified that

1       correspondence had been sent both to  
2       our agency as well as apparently mailed  
3       to Governor Romney. There was some  
4       discussion as to what the content was  
5       of those two letters. But other than  
6       that, it was just general information.

7       Q. Did anyone discuss whether there might  
8       be some first amendment issues if Dr.  
9       Philip was terminated after sending  
10      those letters to Governor Romney?

11                   MS. KELLEY: Objection to form,  
12      but you may answer..

13      A. No, sir.

14      Q. So, no one among the people that you have  
15      named, or the positions that you have  
16      named expressed any first amendment  
17      concerns?

18                   MS. KELLEY: Objection to  
19      form. You may answer..

20      A. No, sir.

21      Q. In your view, what were the reasons for  
22      the termination of Dr. Philip's contract?

23      A. Dr. Philip's contract, I believe, had  
24      mentioned in the job duties that he was

1 located in the administrative pool of  
2 our office. I can't recall actually the  
3 exact time when it was handed to me, but  
4 it was certainly within a day of receipt,  
5 I assure you of that.

6 Q. Now, were either of these letters  
7 discussed at all during your  
8 collaboration on the letter of  
9 termination to be sent to Dr. Philip?

10 A. Yes, sir.

11 Q. Do you recall which of those letters  
12 was discussed during your collaboration  
13 about the termination letter to be sent  
14 to  
15 Dr. Philip?

16 A. As I mentioned earlier in my testimony,  
17 the meeting held with members of the  
18 executive office and medical examiner  
19 staff discussed that these particular  
20 pieces of correspondence had been  
21 received by our office. The essence of  
22 our discussion was simply, one, first  
23 on the matter of Exhibit 5 and 6 that  
24 what appear to be Dr. Philip's detailed